CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER 93-097
NPDES NO. CA00299552

WASTE DISCHARGE REQUIREMENTS FOR:

ROMIC CHEMICAL CORPORATION
2081 BAY ROAD
EAST PALO ALTO, SAN MATEO COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. Romic Chemical Corporation (Romic), hereinafter called the discharger, in a October 30, 1991 application, has applied for issuance of waste discharge requirements under the National Pollutant Discharge Elimination System (NPDES).

2. The discharger has entered into an agreement with EPA to perform remediation of the shallow groundwater at Romic as specified in the Administrative Order on Consent (U.S. EPA Docket No. RCRA-09880015) by EPA on December 8, 1988.

3. The Romic solvent recycling facility is located at Bay Road, East Palo Alto, San Mateo County, California (Figure 1). The 14-acre site is approximately 1/2 mile west of San Francisco Bay (Figure 2) and is bounded on the west and south by automobile dismantlers, and on the north and east by a tidal slough, a former salt evaporation pond which is now an open-space reserve and tidal salt marshes connected to San Francisco Bay. Surface elevations on-site range from 5 to 11 feet above mean sea level (MSL). Most of the facility is surfaced with cement or asphalt; portions of the site are unpaved.

4. Solvent recycling operations have occurred at the Romic site since 1956, when Hird Chemical Corporation established the facility. Carad Chemical Corporation purchased the facility in 1959 and owned and operated the plant until 1963, at which time P.D. Electronics purchased the plant and Romic assumed operation. Romic purchased the facility from P.D. Electronics in 1979 and has continued operations to the present.

5. Because of past waste management practices, a variety of volatile organic compounds (VOC) have been detected in the soil and ground water. Samples have been analyzed for PCBs, pesticides and dioxins, which were not detected. Low concentrations of phtalates and esters were detected in some ground waster samples. Ground water samples were analyzed for total metals, which did not exceed state drinking water standards.

6. The discharger seeks to minimize the further migration of VOCs and to stabilize the majority of the affected ground water by installing a ground water extraction and treatment system. The discharger has proposed to install an interim ground water extraction and treatment system that will focus on hot spot remediation. The discharger has proposed to extract ground water from one or more wells at approximately 5,000 - 10,000 gallons per day (gpd). Total extraction rates will increase as more extraction wells are put on-line. The treated ground water will be discharged to an unnamed slough which connects to the South San Francisco Bay.

7. The Board adopted a revised Water Quality Control Plan (Basin Plan) on December 11, 1991. The Basin Plan contains water quality objectives for South San Francisco Bay.

8. The existing and potential beneficial uses of South San Francisco Bay include:

- Contact and non-contact water recreation
- Wildlife habitat
- Preservation of rare and endangered species
- Fresh water habitat
- Fish spawning and migration
- Industrial service supply
- Navigation
- Ocean commercial and sport fishing
- Shellfishing
- Estuarine habitat

9. The Basin Plan prohibits discharge of wastewater which has "particular characteristics of concern to beneficial uses (1) at any point in San Francisco Bay south of the Dumbarton Bridge and (2) at any point where the wastewater does not receive a minimum initial dilution of at least 10:1 or into any nontidal water, dead-end slough, similar confined water, or any immediate tributary thereof."

10. Exceptions to the prohibitions referred to in the above are allowed by the Basin Plan and are warranted for this discharge because: (1) the discharger has performed a water reclamation study and determined that reclamation, reuse, or discharge to the POTW is not a viable option, as described herein, (2) the discharger has provided certification of the adequacy and reliability of treatment facilities and a plan that describes procedures for proper operation and maintenance of all treatment facilities, as described in herein, and (3) because receiving water concentrations are expected to be below levels that would affect beneficial uses. Should studies indicate acute or chronic effects not currently anticipated, the Board will review the requirements of this Order based upon limitations herein.

11. Based upon the criteria in Board Resolution No. 88-160 and on information submitted by the discharger, the Board finds that treated extracted groundwater reclamation, re-use, or discharge to a POTW from the site is not feasible at this time.

12. The discharger has submitted a satisfactory Interim Corrective Measures Evaluation and Feasibility Study for the treatment system dated April 28, 1993.

13. Available data from the San Francisco Bay Region indicate that concentrations of metals in treated groundwater often exceed shallow water effluent limitations. In many cases, the presence of metals in groundwater is due to natural factors related to soil and water chemistry, rather than contamination.

14. The State Water Resources Control Board's Inland Surface Waters and Enclosed Bays and Estuaries Plans allow for short-term variances from Basin Plan provisions, if necessary, for discharges resulting from control measures to protect drinking water supplies and where natural background concentrations are typically greater than shallow water effluent limits. The variances may take the form of alternate effluent limitations.

15. The Basin Plan prohibits discharge of "all conservative toxic and deleterious substances, above those levels which can be achieved by a program acceptable to the Board, to waters of the Basin." The discharger's ground water extraction and treatment systems and associated operation, maintenance, and monitoring plans constitute an acceptable control program for minimizing the discharge of toxicants to waters of the State.

16. Effluent limitations of this Order are based on the Clean Water Act, Basin Plan, State and U.S. Environmental Protection Agency (EPA) plans and policies, and best engineering and geologic judgement. EPA Region IX draft guidance "NPDES Permit Limitations for Discharge of Contaminated Groundwater: Guidance Document" was also considered in the determination of effluent limits.

17. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.

18. The Board has notified the discharger and interested agencies and persons of its intent to issue waste discharge requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.

19. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the discharger, its agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. EFFLUENT LIMITATIONS

1. The effluent, at the discharge point, shall not contain constituents in excess of the limits contained in Table 1:

2. The flow of the discharge shall not exceed 100,000 gallons per day.

3. The pH of the discharge shall not exceed 8.5 nor be less than 6.5.

4. In any representative set of samples, the discharges shall meet the following limit of quality:

   Toxicity: The survival of test fishes in 96-hour static bioassays of the undiluted effluent as discharged shall be a three sample moving median of 90% survival, and a 90 percentile value of not less than 70% survival in a single sample. Static renewal bioassays shall be performed according to protocols approved by the U.S. EPA or the State Water Resources Control Board or published by the American Society for Testing and Materials or American Public Health Association. Two fish species, fathead minnow and three spine stickleback or other species approved by the Executive Officer will be tested concurrently.

B. RECEIVING WATER LIMITATIONS

1. The discharge of wastes shall not cause the following conditions to exist in waters of the State at any place:

   a. floating, suspended, or deposited macroscopic particulate matter or foam;

   b. bottom deposits or aquatic growths;

   c. alteration of temperature or apparent color beyond present natural background levels;

   d. visible, floating, suspended, or deposited oil or other products of petroleum origin;

e. toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on aquatic biota, wildlife, or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentrations.

2. The discharge of waste shall not cause the following limits to be exceeded in waters of the State in any place within one foot of the water surface:

a. pH: The pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH levels by more than 0.5 units.

b. Dissolved oxygen: 5.0 mg/l minimum. The median dissolved oxygen concentration for any three consecutive months shall not be less than 80% of the dissolved oxygen content at saturation. When natural factors cause lesser concentration(s) than specified above, the discharge shall not cause further reduction in the concentration of dissolved oxygen.

c. Un-ionized ammonia (as N): The unionized ammonia in the discharge shall not exceed the following:

0.025 mg/l annual mean
0.4 mg/l maximum

3. This discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Board or the State Water Resources Control Board as required by the Federal Water Pollution Control Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Federal Water Pollution Control Act or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

C. PROVISIONS

1. The discharger shall comply with all sections of this order immediately upon adoption by the Board and upon starting any discharge, except as modified by the time schedule and tasks listed below.

a. TASK 1: PROPOSAL FOR BACKGROUND METALS CONCENTRATIONS DETERMINATION

COMPLETION DATE: No later than September 31, 1993

Submit a technical report acceptable to the Executive Officer which contains a proposal to determine the level of naturally occurring metals in the groundwater in the vicinity of the site. This study shall include, but need not be limited to, the location(s) of background groundwater samples to be obtained, sampling frequency and analyses of both background, influent, and effluent stations, specification of the analytical method for metals and the expected laboratory detection limits, description of QA/QC.

b. TASK 2: BACKGROUND METALS CONCENTRATIONS RESULTS

COMPLETION DATE: No later than 90 days after Executive Officer approval of report required in TASK 1

Submit a technical report acceptable to the Executive Officer containing the results of the groundwater metals concentration study. The report shall include a comparison of what occurs in the local shallow aquifer, both in background and site-affected groundwater, to the effluent limits for shallow water discharge as indicated in Table 1. Should results of the study indicate that the natural background metals concentrations cause the effluent to exceed shallow water effluent limits, the discharger shall provide a technical and cost analysis of increased treatment to reduce mass loading of metals.

2. The discharger shall comply with the self-monitoring program as adopted by the Board and as may be amended by the Executive Officer.

3. The discharger shall notify the Board if any activity has occurred or will occur which would result in the discharge, on a frequent or routine basis, of any toxic pollutant which is not limited by this Order.

4. Any discharge to a location other than the discharge point(s) specified in this Order will require a modification to this Order or submission of a second NPDES application.

5. The discharger shall comply with all items of the attached "Standard Provisions, Reporting Requirements and Definitions" dated December 1986 and modified January 1987, except items A.10, B.2, B.3, C.8 and C.11.

6. This Order expires on August 18, 1998. The discharger must file a report of waste discharge in accordance with

Title 23, Division 3, Chapter 9 of the California Code of Regulations no later than 180 days in advance of such expiration date as application for issuance of new waste discharge requirements.

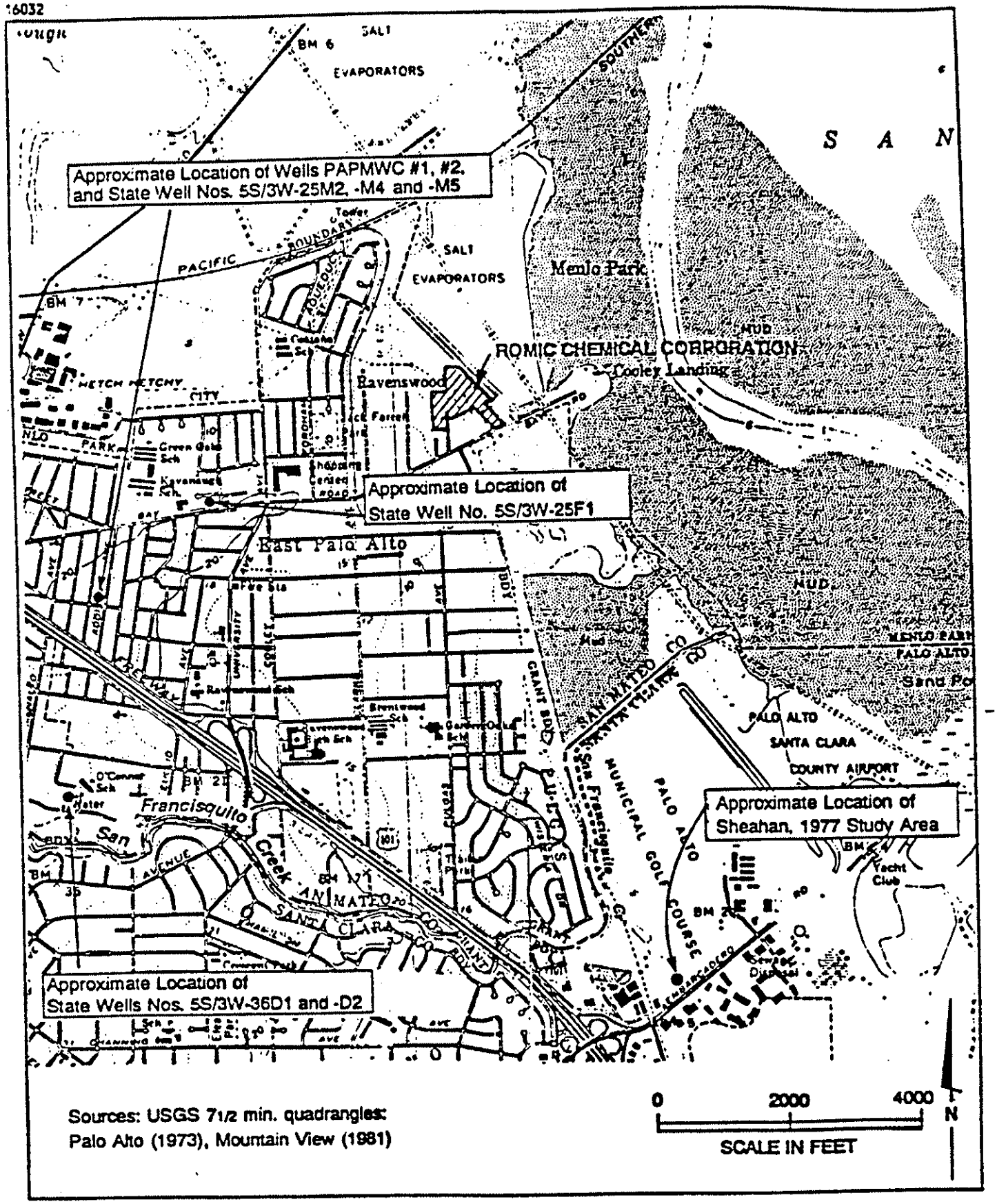
7. This Order shall serve as a National Pollutant Discharge Elimination System Permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on August 18, 1993.

STEVEN R. RITCHIE
Executive Officer

Attachments: Figure 1 - Location Map
Figure 2 - Site Map
Table 1 - Effluent Limitations
Self-Monitoring Program
Statement of Basis

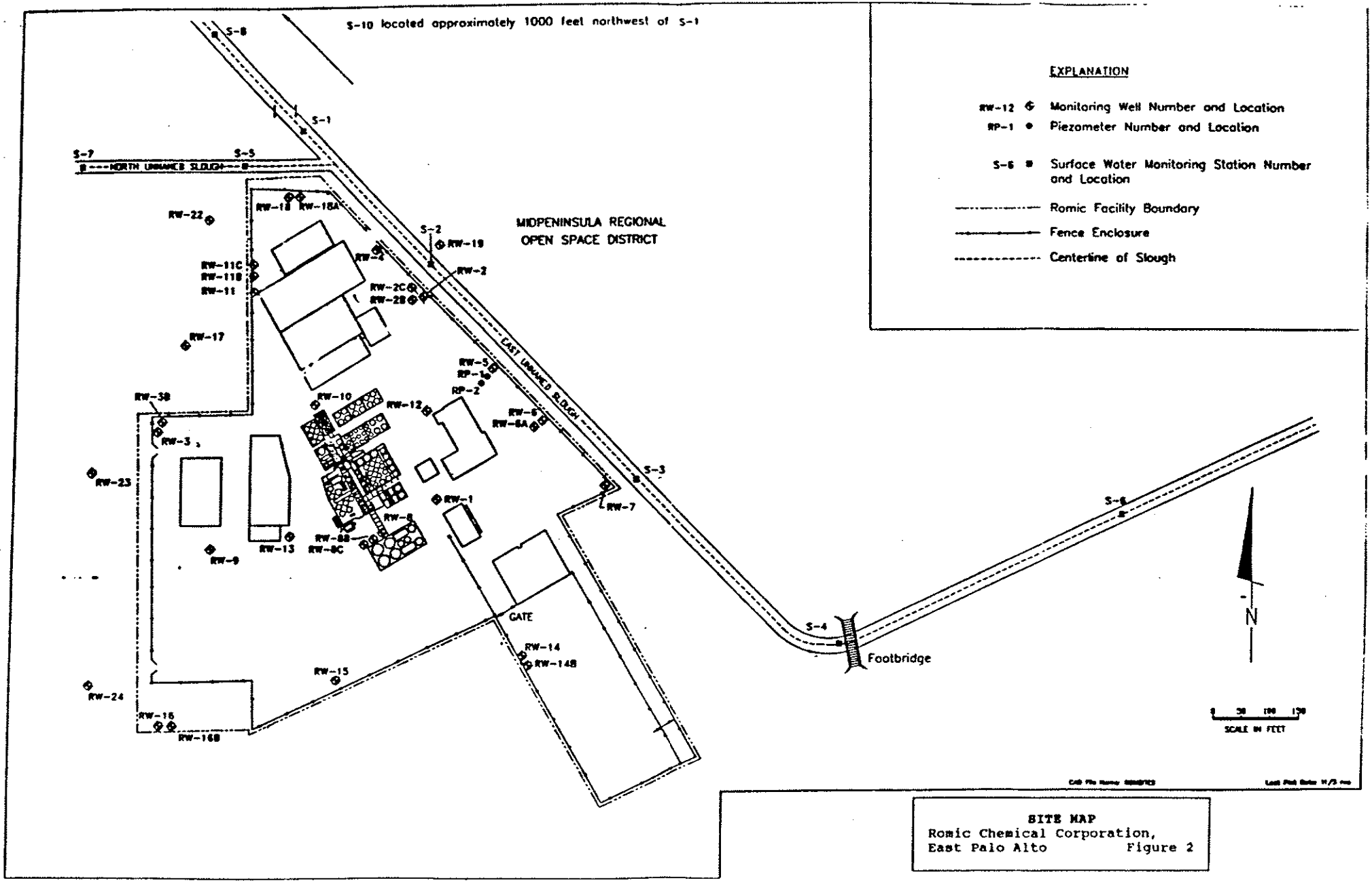
16032



Sources: USGS 7½ min. quadrangles:
Palo Alto (1973), Mountain View (1981)

FROM HLA 1991

Site Location Map
FIGURE 1



SITE MAP
Romic Chemical Corporation,
East Palo Alto Figure 2

TABLE 1 - EFFLUENT LIMITATIONS

Constituent	Instantaneous Maximum Limit (ppb)	Basis for Limitation
Organics		
benzene	5	BAT
chloroform	5	BAT
1,1-dichloroethane	5	BAT
1,2-dichloroethane	5	BAT
1,1-dichloroethene	5	BAT
cis-1,2-dichloroethane	5	BAT
trans-1,2-dichloroethane	5	BAT
1,2-dichloropropane	5	BAT
tetrachloroethene	5	BAT
1,1,1-trichloroethane	5	BAT
trichloroethene	5	BAT
vinyl chloride	5	BAT
Any other volatile organic compound (as identified by EPA Method 601 or 624)	5	BAT
Others		
pH	within range of 6.5 to 8.5	BP
Toxicity to Fish	90% median and 90 percentile value of 70% min.	BP

ppb=parts per billion
BAT=Best available treatment economically available
BP=Basin Plan (as amended December 11, 1991,Table IV-1A)

PART B

ROMIC CHEMICAL CORPORATION
2081 BAY ROAD
EAST PALO ALTO, SAN MATEO COUNTY

I. DESCRIPTION OF SAMPLING STATIONS

A. INFLUENT

Station	Description
I-1	At a point in the groundwater collection system immediately prior to treatment.

B. EFFLUENT

Station	Description
E-1	At a point immediately following treatment and prior to discharge point.

C. RECEIVING WATERS

Station	Description
C-1	At a point in the northern unnamed slough at least 100 feet but no more than 200 feet downstream from the discharge point of E-1 into the northern unnamed slough.
C-2	At a point near Cooley Landing and not within the eastern unnamed slough.

II. SCHEDULE OF SAMPLING AND ANALYSIS

The schedule of sampling and analysis is provided in the attached Table A.

III. MODIFICATIONS TO PART A, DATED DECEMBER 1986 AND MODIFIED JANUARY 1987

All items of Self-Monitoring Program Part A, dated December 1986 and as modified January 1987 shall be complied with except for the following:

A. Additions to Part A: Section G.4.d.5: "Results from each required analysis and observation shall be submitted as laboratory originated data summary sheets in the quarterly self-monitoring reports. All chromatographic peaks for purgeable halocarbons and/or volatile organics

shall be identified and quantified for all effluent samples. If previously unquantified peaks greater than 5 ppb are identified in any effluent sample, then these peaks shall be confirmed based on analyses using chemical standards necessary to achieve proper identification and quantification. Results shall also be submitted for any additional analyses performed by the discharger at the specific request of the Board for parameters for which effluent limits have been established and provided to the discharger by the Board."

B. Deletions from Part A: Sections D.2.b., D.2.g., D.3.b., E.1.e.1, E.1.f., E.2.b., E.3., E.4., E.5., F.2.b., G.2., G.4.b., and G.4.f.

C. Modifications to Part A: For the following, the discharger shall comply with the Sections as changed and reported herein:

1. Section D.2.a. is changed to read:

"Samples of effluent and receiving waters shall be collected at times coincident with influent sampling unless otherwise stipulated. The Regional Board or Executive Officer may approve an alternative sampling plan if it is demonstrated that expected operating conditions warrant a deviation from the standard sampling plan."

2. Section D.2.d. is changed to read:

"If two consecutive samples of any one constituent or parameter monitored on a weekly or monthly basis in a 30-day period exceed the effluent limit or are otherwise out of compliance, or if the required sampling frequency is once per month or less (quarterly, annually or other) and the sample or parameter exceeds the limit or is otherwise out of compliance, the discharger shall implement procedure(s) acceptable to or approved by the Board's Executive Officer, on a case by case basis."

3. Section D.2.e. is changed to read:

"If any instantaneous maximum limit is exceeded, within 24 hours of receiving the analytical results indicating the violation, a confirmation sample shall be taken and analyzed with 24 hour turn-around time. If the instantaneous maximum is violated in the second sample, the discharger shall notify Regional Board staff immediately. The Executive Officer may order the discharge to be terminated, on a case-by-case basis."

4. In Section F.1, the phrase "(at the waste treatment plant)" is changed to read, "(at the location of the extraction and treatment system)."

5. Quarterly written reports required in Section G.4 shall be filed quarterly on the last day of the following month.

6. Section G.4.e is changed to read:

   "Summary tabulations of the data shall include, for each constituent, total number of analyses, maximum, minimum, and average values for each period. Total flow data shall also be included. This information shall be prepared in a format similar to EPA Form 3320-1. These Quarterly Self-Monitoring Reports should be submitted on January 31, April 30, July 31, and October 31 of each year. This information shall be submitted only to the Board:

   Executive Officer
   California Regional Water Quality Control Board
   2101 Webster Street, Suite 500
   Oakland, CA 94612

7. The Annual Report required in Section G.5. shall be submitted by January 31 of each year in place of the quarterly report due on the same day.

IV. MISCELLANEOUS REPORTING

The discharger's proposed treatment system includes the use of steam stripping followed by granular activated carbon. Additional treatment technologies may be utilized. If any additional chemicals or additives are proposed to be used in the operation and/or maintenance of the ground water extraction/treatment system, the discharger shall obtain the Executive Officer's concurrence prior to use. The details concerning such approved use shall be reported in the next periodic report submitted to the Board.

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 93-097.

2. Was adopted by the Board on August 18, 1993.

3. May be reviewed at any time subsequent to the effective date

upon written notice from the Executive Officer or request from the discharger, and revisions will be ordered by the Executive Officer or the Board.

STEVEN R. RITCHIE
Executive Officer

Attachments: Table A
Figure 1 - Location Map
Figure 2 - Site Map

TABLE A
SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS

ROMIC CHEMICAL CORPORATION
2081 BAY ROAD
EAST PALO ALTO, SAN MATEO COUNTY

Sampling Station	I-1	E-1	C-1 & C-2
TYPE OF SAMPLE	G	G	G
Flow Rate (gpd)	cont	cont	-
Bioassay 96-hr % survival	-	Q/Y	-
Electrical Conductivity (umhos/cm)	M/B	M/B	-
Sulfate (ppm)	M/Q	M/Q	-
Ammonia Nitrogen (mg/l & kg/day)	-	V	-
Turbidity (NTU's)	-	Q	-
pH (units)	M/Q	M/Q	Q
Dissolved Oxygen (mg/l and % saturation)	-	Q	Q
Temperature (°C)	M/Q	M/Q	Q
Standard Observations	-	-	Q
Arsenic (ppb)	-	Q/Y	-
Cadmium (ppb)	-	Q/Y	-
Chromium (hexavalent) (ppb)	-	Q/Y	-
Copper (ppb)	-	Q/Y	-
Lead (ppb)	-	Q/Y	-
Mercury (ppb)	-	Q/Y	-
Nickel (ppb)	-	Q/Y	-
Selenium (ppb)	-	Q/Y	-
Silver (ppb)	-	Q/Y	-
Zinc (ppb)	-	Q/Y	-
EPA Method 624	M/B	M/B	Y **
EPA Method 625	Q/Y	Q/Y *	Y **
EPA Method 608	Q/Y	Q/Y *	Y **

LEGEND FOR TABLE A

TYPES OF SAMPLES

G = grab sample
C-24 = 24 hr. composite
Cont. = continuous sampling
DI = depth integrated sample
BS = bottom sediment sample
O = observation
- = none required

TYPES OF STATIONS

I = intake or influent stations
E = effluent sampling stations
D = discharge point sampling stations
C = receiving water sample stations
L = basin and/or pond levee stations
B = bottom sediment station
G = groundwater station

FREQUENCY OF SAMPLING

H = once each hour
D = once each day
W = once each week
M = once each month

Y = once each year in June

V = varies; total ammonia nitrogen shall be analyzed and un-ionized ammonia calculated whenever fish bioassay test results fail to meet the specified percent survival

* = sampled only if constituents are detected in influent I-1

** = sampled only if constituents are detected in effluent E-1

2/W = 2 days per week
5/W = 5 days per week
2/M = 2 days per month
2/y = once in March and once in September
Q = quarterly, once in March, June, September, and December

W/M = weekly for first three months after startup of operations and reduced to monthly thereafter

W/Y = weekly for first three months after startup of operations and reduced to annually thereafter

M/Y = monthly for first 12 months after startup of operations and reduced to annually thereafter

2D = every 2 days
2W = every 2 weeks
3M = every 3 months
Cont = continuous

Q/Y = quarterly for first year after startup of operations and reduced to annually thereafter

W/Q = weekly for first three months after startup of operations and reduced to quarterly thereafter

M/B = monthly for first 12 months after startup of operations and reduced to every two months thereafter

M/Q = monthly for first three months after startup and reduced to quarterly thereafter

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
2101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612

STATEMENT OF BASIS

ISSUANCE OF WASTE DISCHARGE REQUIREMENTS
TO DISCHARGE TO STATE WATERS
NPDES PERMIT

ROMIC CHEMICAL CORPORATION
2081 BAY ROAD
EAST PALO ALTO, SAN MATEO COUNTY

NPDES Permit No.

I. Facility Description

The Romic Chemical Corporation solvent recycling facility is located at Bay Road, East Palo Alto, San Mateo County, California (Figure 1). The 14-acre site is approximately 1/2 mile west of San Francisco Bay (Figure 2) and is bounded on the west and south by automobile dismantlers, and on the north and east by a tidal slough, a former salt evaporation pond which is now an open-space reserve and tidal salt marshes connected to San Francisco Bay.

Solvent recycling operations have occurred at the Romic site since 1956, when Hird Chemical Corporation established the facility. Carad Chemical Corporation purchased the facility in 1959 and owned and operated the plant until 1963, at which time P.D. Electronics purchased the plant and Romic assumed operation. Romic purchased the facility from P.D. Electronics in 1979 and has continued operations to the present.

II. Discharge Description and Location

The discharger has proposed to install an interim ground water extraction and treatment system that will focus on hot spot remediation. The interim system will include extracting ground water from one or more wells at 5,000 - 10,000 gallons per day (gpd). Total extraction rate will increase as more extraction wells are put on-line. The treated ground water will be discharged to an unnamed slough which connects to South San Francisco Bay.

III. Basis for Tentative Waste Discharge Requirements' Effluent and Receiving Water Limitations

The proposed effluent and receiving water limitations are based on the Clean Water Act, San Francisco Bay Basin Plan,

State plans and policies, Regional Board's "Guidance Document for Discharge of Polluted Groundwater to Surface Waters, September 1985," EPA Region IX's Draft "NPDES Permit Limitations for Discharge of Contaminated Groundwater: Guidance Document" dated July 1986, EPA and State maximum contaminant levels for drinking water, analytical method detection limits and best professional judgement.

Section 301(b)(2) of the Clean Water Act calls for effluent limitations that require the application of best available treatment (BAT) economically achievable. This treatment technology includes using steam stripping followed by granular activated carbon. For practically all groundwater polluted with organic chemicals (VOCs), granular activated carbon will reduce contaminant concentrations to below method detection limits (MDLs). In producing EPA's "Draft NPDES Permit Limitations for Discharge of Contaminated Ground Water Guidance Document," the Office of Drinking Water carried out a substantial review of ground water treatment technologies and their cost. Results of this review indicate that VOC BAT limits in NPDES permits can be set at a level consistent with technology-based MCLs. Therefore, setting effluent limits for VOCs at 5 parts per billion (ppb) is appropriate.

Levels for some EPA priority pollutant metals are stipulated in the Basin Plan, Table IV-1A. Available data indicate that concentrations of metals in the groundwater often exceed the shallow water effluent limitations. In many cases, the presence of metals in groundwater is due to natural factors related to soil and water chemistry, rather than contamination. The permit contains effluent metal limitations for shallow water discharge to freshwater.

This discharge is not expected to exceed the shallow water effluent limitations contained in Limitation A.1. However, with the knowledge that some discharges may exceed shallow water effluent limitations for metals (as specified by the Basin Plan amended December 1991), the Board will be preparing a strategy for modifying effluent limitations in NPDES permits for the discharge of treated groundwater. This strategy may include requiring the discharger to determine the level of naturally occurring metals in the groundwater in the vicinity of the site.

The limitations discussed above will protect beneficial uses of the unnamed slough and South San Francisco Bay. Specific rationale for each limitation is summarized in Tables 1 and 2.

TABLE 2 - RECEIVING WATER LIMITATIONS

Constituent	Instantaneous Limit	Basis for Limitation
pH	within range of 6.5 to 8.5	Basin Plan
Dissolved Oxygen	5 mg/l minimum 3-month median at least 80% of saturation	Basin Plan
Un-ionized ammonia (as N)	0.025 mg/l annual mean 0.4 mg/l maximum	Basin Plan

IV. Prohibitions and Provisions

The tentative Waste Discharge Requirements would also grant exceptions to two Basin Plan prohibitions against discharge of waste containing "characteristics of concern to beneficial uses" (1) at any point below the Dumbarton Bridge, and (2) to any point where less than 10:1 initial dilution is achieved. The Basin Plan allows for exceptions to these prohibitions when a discharge is part of a groundwater cleanup project, and it has been demonstrated that neither reclamation nor discharge to a POTW is technically and economically feasible, and the discharger has provided certification of the adequacy and reliability of the treatment facility. Based on current information provided by the discharger, reclamation or discharge to the POTW is not a feasible option, and the effluent concentrations for this discharge should not affect beneficial uses of the receiving waters. A third Basin Plan prohibition, the prohibition against discharge of toxicants above levels achievable in a program acceptable to the Board, is considered to be satisfied by provision of treatment to meet the effluent limitations of this permit.

The tentative Waste Discharge Requirements contain standard provisions which are placed in all NPDES permits issued by the Regional Board. These provisions include requiring compliance with a self-monitoring program and setting the permit expiration date.

V. Expiration Date

The expiration date of the permit is August 18, 1998.

Attachment: Figure 1 - Location Map